

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

RUSTY STRICKLAND,)	
ALAN AND AMY WEST FARMS,)	
ALAN WEST,)	
AMY WEST,)	
DOUBLE B FARMS, LLC, and)	
BRYAN BAKER,)	
Plaintiffs,)	
)	
v.)	Case No. 2:24-cv-60-Z
)	
THE UNITED STATES DEPARTMENT OF)	
AGRICULTURE,)	
)	
THOMAS J. VILSACK, in his official capacity)	
as Secretary of the United States Department of)	
Agriculture,)	
)	
ZACH DUCHENEAUX, in his official)	
capacity as Administrator of the Farm Service)	
Agency, and)	
)	
THE UNITED STATES OF AMERICA,)	
Defendants.)	

SUPPLEMENTAL DECLARATION OF ALAN WEST

I, Alan West, declare the following:

1. The facts set forth in this declaration are based on my knowledge and, if called as a witness, I can competently testify to their truthfulness under oath. As to those matters that reflect a matter of opinion, they reflect my personal opinion and judgment upon the matter.
2. I am a citizen of the United States, a resident of Texas, over 18 years of age, and have personal knowledge of the facts set forth herein.
3. I am fully competent to make this declaration.

4. I applied to USDA's Natural Resources Conservation Service (NRCS) on behalf of Alan and Amy West Farms for a grant under the Environmental Quality Incentives Program (EQIP) to replace two center pivots on my farm in the summer of 2023.

5. In March of 2024, I received a letter from the Lubbock County NRCS, which administers EQIP, informing me about a working group meeting to be held on March 27, 2024, discussing EQIP. An authentic copy of the letter is attached to this declaration.

6. One of the topics listed on the agenda for the meeting was the payment schedule for socially disadvantaged and other underserved farmers under EQIP.

7. I was unable to attend the working group meeting.

8. Instead, in early April of 2024, I spoke with two directors of Lubbock County NRCS, who had attended the meeting.

9. They told me that whether a farmer was socially disadvantaged or otherwise underserved was a factor in ranking their proposals for EQIP funding.

10. This was consistent with other information I have received from USDA about EQIP, such as that socially disadvantaged and other underserved farmers have access to a reserved pool of funds that makes their proposals more likely to be approved.


11. Further, I understand that socially disadvantaged and other underserved farmers are eligible for favorable payment treatment under EQIP.

12. My application is still under consideration.

13. USDA's decision that I must be a veteran, a new farmer, or struggling to make ends meet to be entitled to the same opportunities as every other American farmer is stigmatizing and discriminatory. I am aware that USDA, through NRCS, is punishing me because of my race.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: 05/22/2024


Alan West (May 22, 2024 12:08 CDT)
Alan West



Farm
Production
and
Conservation

Natural
Resources
Conservation
Service

Lubbock County USDA NRCS
6113 43rd St., Suite A
Lubbock, TX 79407
806-785-5644 ext. 3

3/13/2024

SUBJECT: Lubbock County, Local Workgroup Listening Session

FROM: Mcagan Riley, NRCS Lubbock County District Conservationist

WHEN: March 27th, 2024 at 9:30 am

WHERE: Ag Texas Farm Credit Services
5004 North Loop 289
Lubbock, TX 79416

As a farmer, rancher, land manager or stakeholder in Lubbock County, you recognize both the challenges and the opportunities we have for solving natural resource problems together. The USDA Natural Resources Conservation Service (NRCS) and our partnering Soil and Water Conservation Districts will be hosting a Local Work Group Listening session to gather your input, along with other members of the community regarding the natural resource opportunities and priorities across the county. The annual Local Work Group Meeting will be held at 9:30 am on March 27th, 2024 at Ag Texas Farm Credit Services, 5004 North Loop 289 Lubbock, TX 79416.

Our goal is to bring together individuals with a variety of expertise and knowledge allowing NRCS and others to build on our collective successes while focusing our efforts to make the greatest impact with our available staff and funding. We need your help to:

- ✓ Identify where the best investments can be made to address natural resource problems,
- ✓ share the work that has already been done in the county, and
- ✓ share your vision for what the county will look like when these natural resource concerns have been solved.

The information gathered at these listening sessions helps provide NRCS and the Districts the necessary technical and financial support to help land managers make on-the-ground management decisions that produce positive ecological outcomes at the local and state level. This input helps determine collaborative efforts for natural resource priorities and identifies opportunities to address them with conservation practices that improve soils, watershed health, biodiversity, and farmers' livelihoods.

If you are unable to attend this meeting but would like additional information or would like to provide your input, please contact our office at 806-785-5644 ext. 3, or e-mail meagan.riley@usda.gov. These meetings are open to the public, so please feel free to share this information with others who may be interested in participating. Enclosed, please find the agenda for the meeting. Thank you in advance for your time and participation in this very important process.

Sincerely,

Meagan Riley
District Conservationist
USDA NRCS



*Lubbock County Soil and Water Conservation District
6113 43rd Street – Lubbock, TX 79407 – Telephone (806) 785-5644 Ext. 3*

**LUBBOCK COUNTY
LOCAL WORK GROUP MEETING
March 27, 2024**

AGENDA

- I. Call to Order – Welcome & Group Introductions** **Lacy Vardeman, Chairman
Lubbock County SWCD**
- II. Purpose of Program Development Group**
- III. General Information, Guidelines and Changes in EQIP for 2025**
- IV. Ranking Tool for 2025 EQIP – CART (Conservation Assessment Ranking Tool)**
- V. Review 2024 EQIP Priorities, Practices and Accomplishments**
- VI. Program Development Group Recommendations**
 - A. Review Resource Concerns and Landuses for Lubbock County**
 - B. Establish 2025 Ranking of Resource Concerns for Each Landuse**
 - C. Establish 2025 Percent of County Base Funds for Each Landuse**
 - D. Payment Schedule for 2025 EQIP**
 - 1. Payment Schedule for Socially Disadvantaged, Veteran Farmers & Ranchers & Beginning Farmers or Ranchers**
 - 2. Payment Rates are used in lieu of cost share rates.**
 - E. Public Outreach Efforts**
 - 1. Radio**
 - 2. Newspaper**
 - 3. Letters**
 - 4. Local Agribusinesses**
 - 5. Other:**
- VI. Other or Miscellaneous Items**
- VII. Adjourn**